

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
	:	
<b>H &amp; S TOWING SERVICE, INC.</b>	:	<b>CHAPTER 11</b>
	:	
<b>Debtor-in-Possession</b>	:	<b>CASE NO. 1:19-bk-01801-HWV</b>
	:	

**LIMITED OBJECTION OF  
LAW OFFICES OF CRAIG A. DIEHL AND MICHAEL A. TRIMMER, ESQUIRE TO  
MOTION TO CLOSE A CASE FILED BY LAWRENCE G. FRANK ON BEHALF OF  
H & S TOWING SERVICE, INC.**

COME NOW, Law Offices of Craig A. Diehl and Michael A. Trimmer, Esquire, herein, who have acted in the capacity as attorneys and counsel to Debtor-in-Possession, H & S Towing Service, Inc. (the “Debtor”), in the above-captioned proceeding and various matters to support its ongoing business interests, and hereby file this Limited Objection to the Motion to Close a Case filed by Lawrence G. Frank on behalf of H & S Towing Service, Inc. for the purpose of the filing party’s filing of its Final Chapter 11 Application for Payment of Compensation for Professional Services and Expenses paid and incurred as follows:

1. On April 27, 2019, Debtor filed a Petition under Chapter 11 of the Bankruptcy Code.
2. Applicants have served as counsel to Debtor after the filing of the Petition under Chapter 11 of Title 11, United States Code, and was retained as special counsel to Debtor, as to multiple ongoing regular matters and business requiring legal advice, litigation, and services. An Order was entered on January 20, 2020, approving the employment of Law Offices of Craig A. Diehl and Michael A. Trimmer, Esquire, as special counsel to Debtor.

3. Counsel for Debtor-in-Possession has moved to close this Case prior to the filing of a Final Application for Payment of Compensation for Professional Services and Expenses by the undersigned who have been employed as special counsel.

4. Undersigned counsel is contemporaneously filing its Final Application for Payment of Compensation for Professional Services and Expenses, and needs sufficient time for Notice to Creditors and Other Parties in Interest to Object and be heard, should they wish to do so.

WHEREFORE, undersigned counsel, employed as special counsel in the within Chapter 11 Bankruptcy Case, request this Honorable Court to enter an order delaying the closing of this Bankruptcy Case to permit sufficient time for the contemporaneous filing, notice, and approval of its Final Application for Payment of Compensation for Professional Services and Expenses for its services performed on behalf of the Debtor from December 10, 2021, through and including September 17, 2021.

Respectfully submitted,

Date: October 19, 2021

By: /s/ Michael A. Trimmer, Esq.  
Michael A. Trimmer, Esquire  
Attorney ID No. 84441  
Law Offices of Craig A. Diehl  
3464 Trindle Road  
Camp Hill, PA 17011  
(717)763-7613

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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	:	

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this date, a true and correct copy of the foregoing document was filed with the Clerk, United States Bankruptcy Court, Ronald Reagan Federal Building, 228 Walnut St., Room 320, Harrisburg, PA 17101, and served upon applicable parties by way of electronic service via the ECF system, and by prepaid United States First Class Mail to:

Lawrence G. Frank, Esq.  
Attorney for Debtor-in-Possession  
100 Aspen Drive  
Dillsburg, PA 17019

LAW OFFICES OF CRAIG A. DIEHL

Date: October 19, 2021

By: /s/ Michael A. Trimmer, Esq.  
3464 Trindle Road  
Camp Hill, PA 17011  
(717) 763-7613